## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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Case No. 19-23860 Chapter 13

Jeremiah D. Yates & Kimberly R. Yates, Debtors

Jeremiah D. Yates & Kimberly R. Yates Movant,

- VS. -

Related Trustee Certificate of Default at at Doc No. 81, and Order requiring response at Doc No. 82

Ronda J. Winnecour, Trustee, Respondent

## NOTICE OF PROPOSAL TO CURE PLAN DEFAULTS

- 1. Debtors propose to cure the plan default as pleaded in the Trustee's Certificate of Default.
- 2. The cure shall be effected as follows: Debtors are applying for a loan modification with their mortgage company.
- 3. All Objections to the proposed cure must be filed and served by no later than 21 days after the date of this Notice upon the Debtor and Chapter 13 Trustee. Untimely Objections will not be considered. Any creditor who files a timely Objection to the cure must appear at the scheduled Conciliation Conference on the proposed cure.
- 4. A virtual (via Zoom) Conciliation Conference on the proposed cure will be held on April 18, 2024 at 11 a.m., before the Chapter 13 Trustee. The table and meeting I.D., to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at <a href="http://www.ch13pitt.com/calendar/several">http://www.ch13pitt.com/calendar/several days before the meeting. Parties are expected to familiarize themselves with the Trustee's website at <a href="http://www.ch13pitt.com/">http://www.ch13pitt.com/</a> and to comply with the procedures set forth at that site for conference participation.

RESPECTFULLY SUBMITTED, this 6<sup>th</sup> day of March 2024.

/s/Shawn N. Wright Shawn N. Wright, Esquire Counsel for Debtors; PA#64103 7240 McKnight Road Pittsburgh, PA 15237 (412) 920-6565 shawn@shawnwrightlaw.com